

# **ATTACHMENT 10**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CISCO SYSTEMS, INC., )  
)  
Plaintiff, )  
) Case No.  
vs. ) 5:14-cv-05344-BLF (PSG)  
)  
ARISTA NETWORKS, INC. )  
)  
Defendant. )  
)  
\_\_\_\_\_)

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VIDEOTAPED DEPOSITION OF BALAJI VENKATRAMAN  
Palo Alto, California  
Tuesday, May 2, 2016  
Volume I

Reported by:  
CARLA SOARES  
CSR No. 5908  
Job No. 2302931  
Pages 1 - 116

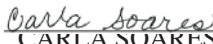
Page 1

<p>1 commands in it?</p> <p>2 A Yes.</p> <p>3 Q Where is that? Give me an example.</p> <p>4 A For example, halfway through the page,</p> <p>5 when it says "Sendin enable" is when Network</p> <p>6 Automation enters the enable mode, the privileged</p> <p>7 mode, and then sends an enable password. And there</p> <p>8 are other examples as well.</p> <p>9 For example, after the configuration is</p> <p>10 done, then Network Automation, or in this case -- or</p> <p>11 NCM would gracefully exit that login session. So</p> <p>12 here it sends an exit, for example, as a command.</p> <p>13 Those are all CLI commands.</p> <p>14 Q And the way it's written here is "sendin,"</p> <p>15 and then opening and closing parentheses. That's</p> <p>16 Perl, right?</p> <p>17 A That's the syntax of Perl.</p> <p>18 Q And then within that -- sorry.</p> <p>19 A Go ahead.</p> <p>20 Q And then within that, there are phrases in</p> <p>21 quotation marks. Those phrases are the CLI commands</p> <p>22 that Cisco switches recognize?</p> <p>23 A In this case, yes.</p> <p>24 Q So if you turn to page 852, which ends in</p> <p>25 HPE84940 --</p> <p style="text-align: right;">Page 66</p>	<p>1 setting the password, setting full duplex, changing</p> <p>2 interface configurations, such.</p> <p>3 Q And those scripts come with the product?</p> <p>4 A Correct.</p> <p>5 Q And do they also come with the product</p> <p>6 that Cisco has rebranded as Network Compliance</p> <p>7 Manager?</p> <p>8 A They would have, yes.</p> <p>9 Q And those scripts contain CLI commands</p> <p>10 that the product will issue to a third-party switch?</p> <p>11 A Correct.</p> <p>12 Q Do you know whether the banner motd CLI</p> <p>13 command is a CLI command that is used by more than</p> <p>14 one vendor?</p> <p>15 A More than one vendor would have the</p> <p>16 ability to specify a banner. The particular syntax</p> <p>17 between vendors may vary, but the capability would</p> <p>18 exist as -- you know, across multiple vendors.</p> <p>19 Q Do you know whether the syntax is the same</p> <p>20 across more than one vendor just for that command in</p> <p>21 particular?</p> <p>22 A No, I -- given that Network Automation</p> <p>23 supports 160-plus vendors, I cannot say that it's</p> <p>24 common across every one. But that's a reasonable</p> <p>25 syntax. If the syntax varies, it would be a</p> <p style="text-align: right;">Page 68</p>
<p>1 A Okay.</p> <p>2 Q -- it's the last page of this appendix,</p> <p>3 this is a sample script in a different language.</p> <p>4 And my question is, third from the bottom,</p> <p>5 just as an example, there's a "send," and then in</p> <p>6 quotation marks, "banner motd."</p> <p>7 A Um-hum.</p> <p>8 Q The "banner motd" in this sample script is</p> <p>9 a CLI command that Network Automation would send to</p> <p>10 a Cisco switch?</p> <p>11 A It doesn't call out Cisco switch in this</p> <p>12 particular example. This is sample expect.</p> <p>13 But yes, banner motd is -- motd stands for</p> <p>14 message of the day. So "banner motd," that's the</p> <p>15 syntax of it, and banner motd is a CLI command with</p> <p>16 a parameter that specifies what that banner ought to</p> <p>17 be.</p> <p>18 Q Okay. If you could flip back now -- well,</p> <p>19 you can just put that down for a second.</p> <p>20 Does Network Automation come with any</p> <p>21 pre-configured command scripts?</p> <p>22 A Yes.</p> <p>23 Q What do those command scripts do?</p> <p>24 A They would allow the network operator to</p> <p>25 perform a variety of commonly used operations, like</p> <p style="text-align: right;">Page 67</p>	<p>1 syntactical thing. It would be very similar to</p> <p>2 this.</p> <p>3 Q Why is that?</p> <p>4 MR. GARTEN: Object as outside the scope.</p> <p>5 You can answer.</p> <p>6 THE WITNESS: Because this is a very</p> <p>7 commonly used operation. Across the board, vendors</p> <p>8 will try to present a uniform interface. So they</p> <p>9 would be similar but not necessarily the same. I</p> <p>10 don't know if they're the same or different, but</p> <p>11 they would be similar.</p> <p>12 BY MR. SANTACANA:</p> <p>13 Q What is the value of a uniform CLI</p> <p>14 interface across vendors?</p> <p>15 A It allows the network operator to leverage</p> <p>16 the learning and the skill that they had with one</p> <p>17 set of vendors and devices to another.</p> <p>18 Q If you could turn to page 632, which ends</p> <p>19 in a Bates number of 4730.</p> <p>20 So this page is part of the section called</p> <p>21 "New Command Script Page Fields." We've been</p> <p>22 discussing command scripts. I have a question about</p> <p>23 this advanced scripting field.</p> <p>24 It says, "If checked, the pages refresh to</p> <p>25 provide settings specific to custom scripts written</p> <p style="text-align: right;">Page 69</p>

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<p>1 Q Regardless of which vendor manufactures 2 the device?</p> <p>3 A Correct.</p> <p>4 Q So every HP customer of Network Automation 5 gets all the device drivers regardless of how many 6 devices they need to support or the -- what they've 7 paid for the product?</p> <p>8 A The device comes pre-packaged with a 9 certain number of devices -- device drivers that 10 every customer gets when they purchase the product.</p> <p>11 Q Okay. 12 (Exhibit 639 was marked for identification 13 and is attached hereto.)</p> <p>14 BY MR. SANTACANA:</p> <p>15 Q Exhibit 639 has a Bates number of 16 ARISTANDCA00224908. It's titled "HP 5900 Switch 17 Series Data Sheet."</p> <p>18 My question for you, sir, is, is this a 19 document that HP kept in the ordinary course of 20 business?</p> <p>21 A It has an HP logo. It's an HP switch. 22 Yes.</p> <p>23 Q Do you know when the document was created 24 by HP?</p> <p>25 A Let's see if there's a date. I have not</p> <p style="text-align: right;">Page 94</p>	<p>1 point says, "Industry-standard CLI with a 2 hierarchical structure" as the -- as one of the 3 features of this switch, and underneath it says, 4 "Reduces training time and expenses, and increases 5 productivity in multi-vendor installations."</p> <p>6 A Right.</p> <p>7 Q Do you have an understanding of what the 8 industry standard CLI with a hierarchical structure 9 is?</p> <p>10 A Yes.</p> <p>11 Q What is that?</p> <p>12 A So as we discussed earlier, the reason to 13 have common, consistent-looking CLI across different 14 vendors and different device types for the devices 15 to present a common interface is because users can 16 leverage the learning on one device to another 17 device, another class of device.</p> <p>18 So in the interest of helping our 19 customers, Hewlett-Packard also implements CLI that 20 is accepted industry standard so that we minimize 21 the amount of time customers have to spend learning 22 our -- our CLI.</p> <p>23 Q Is the industry standard CLI that HP 24 implements to help its customers with training time 25 and expenses, is that a set of specific commands?</p> <p style="text-align: right;">Page 96</p>
<p>1 seen this document before, but if there's a date, I 2 can -- in the last page, it says "Created 3 February 2012," and "Updated February 2013."</p> <p>4 Q Do you know what this document is?</p> <p>5 A This is the device specification for HP 6 5900 switch series.</p> <p>7 Q Do you have any reason to doubt that it is 8 an authentic version of the specification HP 9 created?</p> <p>10 A No. Looking at the logo and the product 11 family name, this is an HP product. I believe this 12 is HP documentation.</p> <p>13 Q Do you know -- do you know who at HP would 14 have created this product -- this document?</p> <p>15 A This document would have been created by 16 the R&amp;D team that is responsible for this particular 17 switch.</p> <p>18 Q Okay. And how do you know that?</p> <p>19 A By default, the team that develops the 20 switch is also responsible for producing product 21 documentation.</p> <p>22 Q Was this document created by the R&amp;D team 23 in the ordinary course of HP's business?</p> <p>24 A I believe so.</p> <p>25 Q If you flip to page 5, the third bullet</p> <p style="text-align: right;">Page 95</p>	<p>1 A They are general guidelines. Every vendor 2 implements the CLI to be consistent with the 3 standard, but every vendor also has proprietary 4 modifications and extensions.</p> <p>5 But in general, the bulk of it will be 6 similar to whatever the standard is.</p> <p>7 Q Do you know what it means when it says "a 8 hierarchical structure"?</p> <p>9 A Hierarchical is where you have a set of 10 base commands, show commands. Hierarchical could be 11 either in terms of the capability or it could be in 12 terms of the privileges that one requires to 13 exercise the CLI.</p> <p>14 Q Do you know of any other vendors that 15 implement what you've called the industry standard 16 CLI?</p> <p>17 A Most vendors would attempt to implement 18 their CLI that is similar to the standard.</p> <p>19 MR. SANTACANA: You can set that aside. 20 (Exhibit 640 was marked for identification 21 and is attached hereto.)</p> <p>22 BY MR. SANTACANA:</p> <p>23 Q Exhibit 640 has the Bates number 24 ARISTANDCA00224917, last page ends in 4949. The 25 document is entitled "HP 6200 yl Switch Series</p> <p style="text-align: right;">Page 97</p>

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<p>1 Q And do you consider yourself to be an 2 expert in patent law? 3 A No. 4 Q And have you read any briefings or papers 5 that are related to this case other than the 6 subpoena? 7 A No. 8 MR. HOLMES: All right. I pass the 9 witness. 10 MR. SANTACANA: Nothing. 11 MR. GARTEN: I just want to put on the 12 record that we'll take the time under the protective 13 order to review and designate the transcript as 14 appropriate. I understand in the 15-day period it's 15 highly confidential, attorney eyes' only. 16 MR. SANTACANA: Okay. 17 THE VIDEO OPERATOR: This concludes 18 today's videotaped deposition of Hewlett-Packard 19 pursuant to Rule 30(b)(6). We're off the record at 20 1:58 p.m. 21 (TIME NOTED: 1:58 p.m.) 22 --o0o-- 23 24 25</p> <p style="text-align: right;">Page 114</p>	<p>1 I, the undersigned, a Certified Shorthand 2 Reporter of the State of California, do hereby 3 certify: 4 That the foregoing proceedings were taken 5 before me at the time and place herein set forth; 6 that any witnesses in the foregoing proceedings, 7 prior to testifying, were administered an oath; that 8 a record of the proceedings was made by me using 9 machine shorthand which was thereafter transcribed 10 under my direction; that the foregoing transcript is 11 a true record of the testimony given. 12 Further, that if the foregoing pertains to 13 the original transcript of a deposition in a Federal 14 Case, before completion of the proceedings, review 15 of the transcript [X] was [ ] was not requested. 16 I further certify I am neither financially 17 interested in the action nor a relative or employee 18 of any attorney or any party to this action. 19 IN WITNESS WHEREOF, I have this date 20 subscribed my name. 21 22 Dated: 05/13/2016 23 24  25 CARLA SOAKES CSR No. 5908</p> <p style="text-align: right;">Page 116</p>
<p>1 2 3 4 5 6 7 8 I, BALAJI VENKATRAMAN, do hereby declare 9 under penalty of perjury that I have read the 10 foregoing transcript; that I have made any 11 corrections as appear noted, in ink, initialed by 12 me, or attached hereto; that my testimony as 13 contained herein, as corrected, is true and correct. 14 EXECUTED this _____ day of _____, 15 2016, at _____, 16 (City) (State) 17 18 19 20 <u>BALAJI VENKATRAMAN</u> 21 22 23 24 25</p> <p style="text-align: right;">Page 115</p>	